

90-DAY RESPONSE**DCI Number: GDCI-128997-1598****Data Call-In Information**Company Name **KOPPERS PERFORMANCE CHEMICALS, INC.**Company Address **1016 EVEREE INN ROAD GRIFFIN, GA 30224**DCI Type **Generic**Issued Date **09/14/2017**90-Day Response Deadline **12/23/2017**CRM Information **Kettl, Brian**Chemical Name **Tebuconazole**Chemical Number **128997****90-Day Response Information**Tracking Number **CDX_DCI_2017_000783****EPA Product Registration Number(s)**

3008-112

I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.

Source EPA Registration Number(s)

Guideline Requirement Number(s)**Guideline Requirement Number - 835.1110**Study Title **Activated sludge sorption isotherm**Protocol **N**Target Submission Date **09/14/2018**Use Pattern **A; Q; C; BB; X**Test Substance **TGAI**Time Frame **12 month(s)**

Footnote(s)

15. This study is required only in support of antimicrobial uses.
34. EPA has a published final guideline for this study:
<https://www.regulations.gov/document?D=EPA-HQ-OPPT-2009-0152-0003>.

Registrant Response **N.A.****Guideline Requirement Number - 835.3110**

Product ingredient source information may be entitled to confidential treatment

Study Title	Ready biodegradability
Protocol	N
Target Submission Date	09/14/2018
Use Pattern	A; Q; C; BB; X
Test Substance	TGAI
Time Frame	12 month(s)
Footnote(s)	15. This study is required only in support of antimicrobial uses. 33. EPA has a published final guideline for this study: https://www.regulations.gov/document?D=EPA-HQ-OPPT-2009-0152-0017 . The biodegradation study required is based on results of an Activated Sludge Respiration Inhibition test.
Regulant Response	N.A.
Guideline Requirement Number - 835.3220	
Study Title	Porous pot test
Protocol	N
Target Submission Date	09/14/2018
Use Pattern	A; Q; C; BB; X
Test Substance	TGAI
Time Frame	12 month(s)
Footnote(s)	15. This study is required only in support of antimicrobial uses. 32. EPA has a published final guideline for this study: https://www.regulations.gov/document?D=EPA-HQ-OPPT-2009-0152-0024 . The biodegradation study required is based on results of an Activated Sludge Respiration Inhibition test.
Regulant Response	N.A.
Guideline Requirement Number - 835.3240	
Study Title	Simulation Test-Aerobic Sewage Treatment-Activated Sludge
Protocol	N
Target Submission Date	09/14/2018
Use Pattern	A; Q; C; BB; X
Test Substance	TGAI
Time Frame	12 month(s)

Footnote(s)	15. This study is required only in support of antimicrobial uses. 31. EPA has a published final guideline for this study: https://www.regulations.gov/document?D=EPA-HQ-OPPT-2009-0152-0034 . The biodegradation study required is based on results of an Activated Sludge Respiration Inhibition test.
Reg strant Response	N.A.
Guideline Requirement Number - 835.3280	
Study T t e	Simulation Tests to Assess the Biodegradability of Chemicals
Protoco	N
Target Subm ss on Date	09/14/2018
Use Pattern	A; Q; C; BB; X
Test Substance	TGAI
T me Frame	12 month(s)
Footnote(s)	15. This study is required only in support of antimicrobial uses. 30. EPA has a published final guideline for this study: https://www.regulations.gov/document?D=EPA-HQ-OPPT-2009-0152-0036 . The biodegradation study required is based on results of an Activated Sludge Respiration Inhibition test.
Reg strant Response	N.A.
Guideline Requirement Number - 850.2100	
Study T t e	Avian acute oral toxicity test
Protoco	N
Target Subm ss on Date	09/14/2018
Use Pattern	A; Q; C; BB; X
Test Substance	TGAI
T me Frame	12 month(s)
Footnote(s)	14. This study is required only in support of conventional uses. 23. Only passerine species toxicity data are required.
Reg strant Response	N.A.
Guideline Requirement Number - 850.3020	
Study T t e	Honey bee acute contact toxicity
Protoco	N
Target Subm ss on Date	09/14/2018

Use Pattern	A; Q; C; BB; X
Test Substance	TGAI
T me Frame	12 month(s)
Footnote(s)	<p>8. Tier 1 study. USEPA. 2012a. "Honey Bee Acute Contact Toxicity" Ecological Effects Test Guidelines OCSPP 850.3020. EPA 712-C-019</p> <p>14. This study is required only in support of conventional uses.</p> <p>21. See also OECD 214: OECD.1998b. OECD Guidelines for the Testing of Chemicals. Test Number 214, Acute Contact Toxicity Test. http://www.oecd-ilibrary.org/environment/test-no-214-honeybees-acute-contact-toxicity-test_9789264070189-en</p>
Reg strant Response	N.A.
Guideline Requirement Number - 850.3030	
Study T t e	Honey bee toxicity of residues on foliage
Protoco	Y
Target Subm ss on Date	09/14/2018
Use Pattern	A; Q; C; BB; X
Test Substance	TEP
T me Frame	12 month(s)
Footnote(s)	<p>2. USEPA. 2012b. "Honey Bee Toxicity of Residues on Foliage." Ecological Effects Test Guidelines OCSPP 850.3030. EPA 712-C-018.</p> <p>9. Tier 1 study. Guideline 850.3030 data are required when the product formulation contains one or more active ingredient(s) having an acute LD50 of < 11 micrograms per bee as determined in the honey bee acute contact study and the use pattern(s) indicate(s) that honey bees may be exposed to the pesticide.</p> <p>14. This study is required only in support of conventional uses.</p> <p>41. A study protocol must be submitted to, and reviewed by the EPA, prior to study initiation.</p>
Reg strant Response	N.A.
Guideline Requirement Number - 850.3040	
Study T t e	Field testing for pollinators
Protoco	Y
Target Subm ss on Date	09/14/2019
Use Pattern	A; Q; C; BB; X
Test Substance	TEP
T me Frame	24 month(s)

Footnote(s)	<p>1. USEPA. 2012c. "Field Testing for Pollinators." Ecological Effects Test Guidelines OCSPP 850.3040. EPA 712-C-017.</p> <p>3. Tier 3 study. The need for a field test for pollinators will be determined based on the results of lower-tiered tests and/or other lines of data and the need for a refined pollinator risk assessment.</p> <p>14. This study is required only in support of conventional uses.</p> <p>20. See information and guidance identified in the EPA documents, (i) USEPA. 2012. White Paper in Support of the Proposed Risk Assessment Process for Bees. Submitted to the FIFRA Scientific Advisory Panel for Review and Comment September 11-14, 2012. Office of Chemical Safety and Pollution Prevention Office of Pesticide Programs Environmental Fate and Effects Division, Environmental Protection Agency, Washington DC; Environmental Assessment Directorate, Pest Management Regulatory Agency, Health Canada, Ottawa, CN; California Department of Pesticide Regulation; (ii) 2014 Guidance for Assessing Pesticide Risks to Bees. Office of Pesticide Programs United States Environmental Protection Agency, Health Canada Pest Management Regulatory Agency, California Department of Pesticide Regulation. June 19, 2014. https://www.epa.gov/sites/production/files/2014-06/documents/pollinator_risk_assessment_guidance_06_19_14.pdf</p> <p>41. A study protocol must be submitted to, and reviewed by the EPA, prior to study initiation.</p>
Reg strant Response	N.A.
Guideline Requirement Number - 850.3300	
Study T t e	Modified Activated Sludge, Respiration Inhibition Test
Protoco	N
Target Subm ss on Date	09/14/2018
Use Pattern	A; Q; C; BB; X
Test Substance	TGAI
T me Frame	12 month(s)

Footnote(s)	<p>15. This study is required only in support of antimicrobial uses.</p> <p>18. The results of the Activated Sludge, Respiration Inhibition Test (ASRI), GLN 850.3300, will determine which of the four biodegradation tests are required. If the ASRI test results in an EC50 of less than or equal to 20 mg/L, then either the (i) Simulation tests to assess the biodegradability of chemicals discharged in wastewater, GLN 835.3280, (ii) the Simulation Test-Aerobic Sewage Treatment: A. Activated Sludge Units, GLN 835.3240, or (iii) the Porous Pot Test, GLN 835.3220 is required. If the ASRI test results in an EC50 greater than 20 mg/L, then the registrant is required to conduct either the (i) Ready Biodegradability, GLN 835.3110, (ii) Simulation tests to assess the biodegradability of chemicals discharged in wastewater, (iii) the Simulation Test-Aerobic Sewage Treatment: A. Activated Sludge Units, or (iv) the Porous Pot Test. If the Ready Biodegradability Study is conducted and passes, then no further testing is required. If, however, the pesticide fails the Ready Biodegradability study, then the (i) Simulation tests to assess the biodegradability of chemicals discharged in wastewater, (ii) the Simulation Test-Aerobic Sewage Treatment: A. Activated Sludge Units, or (iii) the Porous Pot Test is required.</p> <p>24. OECD Test Guideline 209 can also be used as guidance for this study, available online at http://www.oecd-ilibrary.org/content/book/9789264070080-en</p> <p>29. EPA published draft guidance under guideline 850.6800 and has since published final guidance for this study under guideline 850.3300: https://www.regulations.gov/document?D=EPA-HQ-OPPT-2009-0154-0021.</p>
Reg strant Response	N.A.
Guideline Requirement Number - 850.4100	
Study T t e	Seedling Emergence and Seedling Growth
Protoco	N
Target Subm ss on Date	09/14/2018
Use Pattern	A; Q; C; BB; X
Test Substance	TEP
T me Frame	12 month(s)
Footnote(s)	<p>6. Tier 2 data on monocots are required.</p> <p>14. This study is required only in support of conventional uses.</p>
Reg strant Response	N.A.
Guideline Requirement Number - 850.4150	
Study T t e	Vegetative Vigor
Protoco	N
Target Subm ss on Date	09/14/2018
Use Pattern	A; Q; C; BB; X
Test Substance	TEP
T me Frame	12 month(s)

Footnote(s)	7. Tier 2 data on dicots and monocots are required. 14. This study is required only in support of conventional uses.
Reg strant Response	N.A.
Guideline Requirement Number - 850.4500	
Study T t e	Algal Toxicity
Protoco	N
Target Subm ss on Date	09/14/2018
Use Pattern	A; Q; C; BB; X
Test Substance	TGAI, TEP
T me Frame	12 month(s)
Footnote(s)	16. This study is required in support of both antimicrobial and conventional uses. 25. In a Federal Register Notice dated June 27, 2012, EPA split the Public Draft OPPTS 850.5400 test guideline into two test guidelines: OCSPP 850.4500 and OCSPP 850.4550. See "Final Test Guidelines; OCSPP 850 Series; Notice of Availability" 77 FR 38282, June 27, 2012. https://www.regulations.gov/document?D=EPA-HQ-OPPT-2009-0154-0028 . 38. Algal toxicity data required on two species of non-vascular plants (freshwater and marine diatoms).
Reg strant Response	N.A.
Guideline Requirement Number - 850.4550	
Study T t e	Cyanobacteria (Anabaena flos-aquae) Toxicity
Protoco	N
Target Subm ss on Date	09/14/2018
Use Pattern	A; Q; C; BB; X
Test Substance	TGAI, TEP
T me Frame	12 month(s)
Footnote(s)	16. This study is required in support of both antimicrobial and conventional uses. 25. In a Federal Register Notice dated June 27, 2012, EPA split the Public Draft OPPTS 850.5400 test guideline into two test guidelines: OCSPP 850.4500 and OCSPP 850.4550. See "Final Test Guidelines; OCSPP 850 Series; Notice of Availability" 77 FR 38282, June 27, 2012. https://www.regulations.gov/document?D=EPA-HQ-OPPT-2009-0154-0028 .
Reg strant Response	N.A.
Guideline Requirement Number - 850.6100	
Study T t e	Environmental Chemistry Methods and Associated Independent Laboratory Validation

Protoco	N
Target Subm ss on Date	09/14/2018
Use Pattern	A; Q; C; BB; X
Test Substance	TGAI
T me Frame	12 month(s)
Footnote(s)	14. This study is required only in support of conventional uses. 35. ECM/ILV needed for soil and water.
Reg strant Response	N.A.
Guideline Requirement Number - 875.1200	
Study T t e	Dermal exposure--Indoor
Protoco	Y
Target Subm ss on Date	09/14/2018
Use Pattern	A; Q; C; BB; X
Test Substance	TEP
T me Frame	12 month(s)
Footnote(s)	15. This study is required only in support of antimicrobial uses. 19. The following data/scenarios are needed: pressure treatment, liquid pour, sapstain, brush/roller, and airless sprayer. 41. A study protocol must be submitted to, and reviewed by the EPA, prior to study initiation.
Reg strant Response	N.A.
Guideline Requirement Number - 875.1400	
Study T t e	Inhalation exposure--indoor
Protoco	Y
Target Subm ss on Date	09/14/2018
Use Pattern	A; Q; C; BB; X
Test Substance	TEP
T me Frame	12 month(s)
Footnote(s)	15. This study is required only in support of antimicrobial uses. 19. The following data/scenarios are needed: pressure treatment, liquid pour, sapstain, brush/roller, and airless sprayer. 41. A study protocol must be submitted to, and reviewed by the EPA, prior to study initiation.

Reg strant Response	N.A.
Guideline Requirement Number - 875.1700	
Study T t e	Product Use Information
Protoco	N
Target Subm ss on Date	09/14/2018
Use Pattern	A; Q; C; BB; X
Test Substance	TEP
T me Frame	12 month(s)
Footnote(s)	15. This study is required only in support of antimicrobial uses. 22. Product use data is needed to clarify uses (particularly the use of plastics in toys), application rates and wood retentions, and application equipment.
Reg strant Response	N.A.
Guideline Requirement Number - 875.2100	
Study T t e	Foliar dislodgeable residue dissipation
Protoco	N
Target Subm ss on Date	09/14/2018
Use Pattern	A; Q; C; BB; X
Test Substance	TEP
T me Frame	12 month(s)
Footnote(s)	14. This study is required only in support of conventional uses. 28. Foliar dislodgeable and turf transferrable residue dissipation data are required for post-application worker or residential exposure.
Reg strant Response	N.A.
Guideline Requirement Number - 875.2300	
Study T t e	Indoor surface residue dissipation
Protoco	Y
Target Subm ss on Date	09/14/2018
Use Pattern	A; Q; C; BB; X
Test Substance	TEP
T me Frame	12 month(s)

Footnote(s)	<p>15. This study is required only in support of antimicrobial uses.</p> <p>17. The wipe study is based on the need to assess dermal and incidental oral exposures to children (age 1-2) playing on pressure treated decks and play sets.</p> <p>39. A waiver may be requested for all applications if a residue screening level default at 100% of the application rate does not trigger risk concerns.</p> <p>41. A study protocol must be submitted to, and reviewed by the EPA, prior to study initiation.</p>
Reg strant Response	N.A.
Guideline Requirement Number - SS-1196	
Study T t e	Whole Sediment: Chronic toxicity to saltwater invertebrates
Protoco	Y
Target Subm ss on Date	09/14/2019
Use Pattern	A; Q; C; BB; X
Test Substance	TGAI
T me Frame	24 month(s)
Footnote(s)	<p>16. This study is required in support of both antimicrobial and conventional uses.</p> <p>37. Chronic sediment toxicity data required on one species of estuarine/marine amphipod.</p> <p>41. A study protocol must be submitted to, and reviewed by the EPA, prior to study initiation.</p>
Reg strant Response	N.A.
Guideline Requirement Number - SS-1197	
Study T t e	Whole Sediment: Chronic toxicity to freshwater invertebrates
Protoco	Y
Target Subm ss on Date	09/14/2019
Use Pattern	A; Q; C; BB; X
Test Substance	TGAI
T me Frame	24 month(s)
Footnote(s)	<p>16. This study is required in support of both antimicrobial and conventional uses.</p> <p>36. Chronic sediment toxicity data required on two freshwater species (an amphipod and a midge) in support of conventional uses. Only the freshwater amphipod data are required in support of antimicrobial uses.</p> <p>41. A study protocol must be submitted to, and reviewed by the EPA, prior to study initiation.</p>
Reg strant Response	N.A.
Guideline Requirement Number - SS-1311	

Study Title	Honey bee adult acute oral toxicity
Protocol	N
Target Submission Date	09/14/2018
Use Pattern	A; Q; C; BB; X
Test Substance	TGAI
Time Frame	12 month(s)
Footnote(s)	10. Tier 1 study. See the OECD 213: OECD Guidelines for the Testing of Chemicals. Honeybees, Acute Oral Toxicity Test. 213. http://www.oecd-ilibrary.org/environment/test-no-213-honeybees-acute-oral-toxicity-test_9789264070165-en 14. This study is required only in support of conventional uses.
Regulant Response	N.A.
Guideline Requirement Number - SS-1312	
Study Title	Honey bee larvae acute oral toxicity
Protocol	N
Target Submission Date	09/14/2018
Use Pattern	A; Q; C; BB; X
Test Substance	TGAI
Time Frame	12 month(s)
Footnote(s)	13. Tier 1 study. OECD Test Guideline 237 may be used to develop a protocol for this study (OECD. 2013 Guidelines for Testing Chemicals. Honey bee (Apis mellifera) larval toxicity test, single exposure.) See: http://www.oecd-ilibrary.org/environment/test-no-237-honey-bee-apis-mellifera-larval-toxicity-test-single-exposure_9789264203723-en 14. This study is required only in support of conventional uses.
Regulant Response	N.A.
Guideline Requirement Number - SS-1313	
Study Title	Honey bee adult chronic oral toxicity
Protocol	Y
Target Submission Date	09/14/2018
Use Pattern	A; Q; C; BB; X
Test Substance	TGAI
Time Frame	12 month(s)

Footnote(s)	<p>11. Tier 1 study. OECD has not yet finalized test guidelines for chronic studies, and efforts are underway to develop standardized guidelines for assessing the effects from chronic exposure to adult and larvae in the laboratory. Discussion of the study design elements for the 10-day adult toxicity test can be found in Appendix O of the European Food Safety Authority (EFSA) guidance document: EFSA. 2013. Guidance on the risk assessment of plant protection products on bees (<i>Apis mellifera</i>, <i>Bombus</i> spp. and solitary bees). EFSA Journal 2013;11(7):3295, 266 pp. doi:10.2903/j.efsa.2013.3295. Available online at: https://www.efsa.europa.eu/en/efsajournal/pub/3295</p> <p>14. This study is required only in support of conventional uses.</p> <p>41. A study protocol must be submitted to, and reviewed by the EPA, prior to study initiation.</p>
Reg strant Response	N.A.
Guideline Requirement Number - SS-1314	
Study T t e	Honey bee larvae chronic oral toxicity
Protoco	Y
Target Subm ss on Date	09/14/2018
Use Pattern	A; Q; C; BB; X
Test Substance	TGAI
T me Frame	12 month(s)
Footnote(s)	<p>12. Tier 1 study. OECD has not yet finalized test guidelines for chronic studies with honey bee larvae. OECD Draft Guidance Document Honey Bee (<i>Apis mellifera</i>) Larval Toxicity Test, Repeated Exposure. https://www.oecd.org/env/ehs/testing/Honeybee%20larval%20rep%20expo_REV%20following%20April%202015%20expert%20meeting_Draft%2020%20July%202015.pdf</p> <p>14. This study is required only in support of conventional uses.</p> <p>41. A study protocol must be submitted to, and reviewed by the EPA, prior to study initiation.</p>
Reg strant Response	N.A.
Guideline Requirement Number - SS-1315	
Study T t e	Semi-field testing for pollinators
Protoco	Y
Target Subm ss on Date	09/14/2019
Use Pattern	A; Q; C; BB; X
Test Substance	TGAI, TEP
T me Frame	24 month(s)

Footnote(s)	<p>5. Tier 2 study. The need for a semi-field test for pollinators (i.e., either a field-feeding test or a tunnel test) will be determined based on the results of lower-tiered tests and/or other lines of evidence, and the need for a refined pollinator risk assessment.</p> <p>14. This study is required only in support of conventional uses.</p> <p>26. Formal guidelines for semi-field tests do not yet exist; however, information that can help guide the development of a semi-field tunnel test protocol can be found at OECD 75, see: OECD. 2007. Series on Testing and Assessment Number 75. Guidance document on the honey bee (<i>Apis mellifera</i> L.) brood test under semi-field conditions. Environmental Directorate Joint Meeting of the Chemicals Committee and the Working Party on Chemicals, Pesticides and Biotechnology. ENV/JM/MONO(2007)22. 31-Aug-2007. http://www.oecd.org/officialdocuments/publicdisplaydocumentpdf/?cote=env/jm/mono(2007)22&doclanguage=en.</p> <p>27. For field-feeding studies see: Oomen et al. 1992: Oomen, P. A. A. DeRuijter and J. Van der Steen. 1992. Method for honey bee brood feeding tests with insect growth-regulating insecticides. <i>Bul OEPP/EPPO Bulletin</i> 22: 613-616.</p> <p>41. A study protocol must be submitted to, and reviewed by the EPA, prior to study initiation.</p>
Reg strant Response	N.A.
Guideline Requirement Number - SS-1316	
Study T t e	Field trial of residues in pollen and nectar
Protoco	Y
Target Subm ss on Date	09/14/2019
Use Pattern	A; Q; C; BB; X
Test Substance	TEP
T me Frame	24 month(s)
Footnote(s)	<p>4. Tier 2 study. The need for this study will be determined based on the results of lower-tiered studies and/or other lines of data and the need for a refined pollinator risk assessment.</p> <p>14. This study is required only in support of conventional uses.</p> <p>40. A study protocol must be submitted to, and reviewed by the EPA, prior to study initiation. The following elements could be considered when developing study protocol(s) for the monitoring of residues in pollen/nectar. 1) Consideration of the range of application methods and environmental conditions (e.g., soil and hydric regimes) that the target crop(s) may be under. 2) Consideration of the attractiveness of the selected crop to pollinators. 3) Consideration of a collection schedule sufficient to allow for an understanding of the character of residues, in the pollen/nectar and/or plant tissues, over time. 4) Consideration of data sufficient to determine whether residues of the active ingredient and/or degradation product(s) accumulates in soil and is/are bioavailable for plant to uptake in a following planting, and therefore result in potential exposure to pollinators. 5) Consideration of the market proportion of the selected target crop(s).</p>
Reg strant Response	N.A.
Submitter Information	
Subm tter	Leigh Ann Richardson

Submitted Date	09/22/2017
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